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**From:** Beck, Nancy [Beck.Nancy@epa.gov]  
**Sent:** 5/29/2019 2:49:23 PM  
**To:** Strauss, Linda [Strauss.Linda@epa.gov]  
**CC:** Bertrand, Charlotte [Bertrand.Charlotte@epa.gov]; Baptist, Erik [Baptist.Erik@epa.gov]; Dunton, Cheryl [Dunton.Cheryl@epa.gov]; Altieri, Sonia [Altieri.Sonia@epa.gov]; Tyler, Tom [Tyler.Tom@epa.gov]; Keller, Kaitlin [keller.kaitlin@epa.gov]; Han, Kaythi [Han.Kaythi@epa.gov]  
**Subject:** Re: extension until next Tuesday - FW: For approval Press response: Franklin County Free Press -

Yep.

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Nancy B. Beck, Ph.D., DABT  
Principal Deputy Assistant Administrator  
Office of Chemical Safety and Pollution Prevention  
P: 202-564-1273  
[beck.nancy@epa.gov](mailto:beck.nancy@epa.gov)

On May 29, 2019, at 10:48 AM, Strauss, Linda <[Strauss.Linda@epa.gov](mailto:Strauss.Linda@epa.gov)> wrote:

Nancy, I forgot to follow-up with you on this last week. Good to go? OECA is good with it.

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**From:** Strauss, Linda  
**Sent:** Wednesday, May 22, 2019 9:03 AM  
**To:** Beck, Nancy <[Beck.Nancy@epa.gov](mailto:Beck.Nancy@epa.gov)>  
**Cc:** Bertrand, Charlotte <[Bertrand.Charlotte@epa.gov](mailto:Bertrand.Charlotte@epa.gov)>; Baptist, Erik <[baptist.erik@epa.gov](mailto:baptist.erik@epa.gov)>; Dunton, Cheryl <[Dunton.Cheryl@epa.gov](mailto:Dunton.Cheryl@epa.gov)>; Altieri, Sonia <[Altieri.Sonia@epa.gov](mailto:Altieri.Sonia@epa.gov)>; Tyler, Tom <[Tyler.Tom@epa.gov](mailto:Tyler.Tom@epa.gov)>; Keller, Kaitlin <[keller.kaitlin@epa.gov](mailto:keller.kaitlin@epa.gov)>; Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>  
**Subject:** RE: extension until next Tuesday - FW: For approval Press response: Franklin County Free Press

My bad. Added red below to address that.

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**From:** Beck, Nancy  
**Sent:** Wednesday, May 22, 2019 7:21 AM  
**To:** Strauss, Linda <[Strauss.Linda@epa.gov](mailto:Strauss.Linda@epa.gov)>  
**Cc:** Bertrand, Charlotte <[Bertrand.Charlotte@epa.gov](mailto:Bertrand.Charlotte@epa.gov)>; Baptist, Erik <[Baptist.Erik@epa.gov](mailto:Baptist.Erik@epa.gov)>; Dunton, Cheryl <[Dunton.Cheryl@epa.gov](mailto:Dunton.Cheryl@epa.gov)>; Altieri, Sonia <[Altieri.Sonia@epa.gov](mailto:Altieri.Sonia@epa.gov)>; Tyler, Tom <[Tyler.Tom@epa.gov](mailto:Tyler.Tom@epa.gov)>; Keller, Kaitlin <[keller.kaitlin@epa.gov](mailto:keller.kaitlin@epa.gov)>; Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>  
**Subject:** Re: extension until next Tuesday - FW: For approval Press response: Franklin County Free Press

What is a "distributor product"?

Thanks.

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Nancy B. Beck, Ph.D., DABT  
Principal Deputy Assistant Administrator  
Office of Chemical Safety and Pollution Prevention  
P: 202-564-1273

[beck.nancy@epa.gov](mailto:beck.nancy@epa.gov)

On May 21, 2019, at 9:45 PM, Strauss, Linda <[Strauss.Linda@epa.gov](mailto:Strauss.Linda@epa.gov)> wrote:

Approved by Rick and Ed. Susan Bodine just approved tonight too.

**Incoming:**

My name is David Taylor with Franklin County Free Press. My questions are in reference to "Triple Action Neem Oil Broad Spectrum Fungicide, Insecticide, and Miticide" containing "Malathion, Chlorpyrifos, and Permethrin". The Pennsylvania Department of Agriculture issued a press release advising everyone to dispose of the product. The Oregon Department of Agriculture has issued a removal order to Southern Agricultural Insecticides Inc. Other states that we have found warnings issued are Alaska, Colorado, and Texas.

What is the EPA position on this issue?

Will the EPA issue a recall for Triple Action Neem Oil Broad Spectrum Fungicide, Insecticide, and Miticide?

What is the PPM of Malathion in the product?  
What is the EPA acceptable limit for Malathion?

What is the PPM of Chlorpyrifos in the product?  
What is the EPA acceptable limit for Chlorpyrifos?

What is the PPM of Permethrin in the product?  
What is the EPA acceptable limit for Permethrin?

**Response:**

Triple Action Neem Oil (EPA Reg. No. 70051-2-829) is a distributor product under the primary registration for NEEM OIL 70% (EPA Reg. No. 70051-2).

A distributor product is one where a registrant distributes or sells their registered product under another company's name and address instead of (or in addition to) their own under FIFRA. Read more about these products here: <https://www.epa.gov/pesticide-registration/pesticide-registration-manual-chapter-9-supplemental-distribution-registered>

The only active ingredient the EPA has approved for this product formulation is neem oil. Malathion, chlorpyrifos, and permethrin are not approved for use in this product. Though these active ingredients are used in other registered pesticides, they are not part of the approved formulation for this product.

EPA is aware of the state actions that have been taken regarding this product. While we cannot comment on the status of or how we will proceed with any investigation, EPA continues to work with our state partners to enforce against the sale and distribution of illegal pesticides.

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What is the PPM of Chlorpyrifos in the product?

What is the EPA acceptable limit for Chlorpyrifos?

What is the PPM of Permethrin in the product?

What is the EPA acceptable limit for Permethrin?

Thank You

David Taylor

[fcfreepress@gmail.com](mailto:fcfreepress@gmail.com)

<http://fcfreepress.com>